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Republican National Committee
310 First Street, SE
Washington, DC 20003

January 12, 2015

Jeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Re: MUR 6888

Dear Mr. Jordan:

Days before the 2014 election, the American Democracy Legal Fund ("ADLF") filed a politically motivated Complaint and supplemental Complaint (collectively, the "Complaint") against the Republican National Committee ("RNC") and a host of other Republican entities that is nothing more than a rhetorically charged, overreaching parade of erroneous legal theories and inaccurate facts, which relies primarily on internet stories, which in turn rely on anonymous and uninformed sources, unfounded conclusory statements, and out-of-context quotes. For the reasons explained below, the Commission should promptly dismiss the Complaint against the RNC.

I. INTRODUCTION & STATEMENT OF THE FACTS

By all accounts, data about voters has always been an important component of political campaigns. Recognizing the importance of raw data to decisions about voter registration identification, and turnout, the RNC has an active and robust Digital & Data Department. In 2011 and 2012, for example, the RNC Strategy team's (now known as the Data team) budget was approximately \$14 million. Affidavit of Chuck DeFeo ("DeFeo Aff.") ¶ 5. In 2013, the Strategy and Digital teams were combined to form the Digital & Data Department. *Id.* ¶ 5. The

department is responsible for all aspects of the RNC's data and digital effort, including the RNC's voter data collection efforts, website and online presence (Facebook, Twitter, etc.), online fundraising, and developing and managing "political technology" tools such as websites and applications for voter registration and absentee ballot requests, as well as – and most importantly – management of the RNC's voter file. *Id.* ¶ 7. In 2014 alone, the RNC invested approximately \$11.5 million in that effort, for staff salaries and benefits, hardware such as servers and web hosting, data acquisition, and software. *Id.* ¶ 5. The RNC collects data for its own use, such as for fundraising, party building, voter contact and social media, and it hires outside vendors to complement the in-house effort. For example, it paid \$1.2 million to a vendor in 2014 alone for data acquisition calls and data consulting. *Id.* ¶ 5. The RNC also established Para Bellum Labs, its own in-house digital start-up and innovation hub,¹ and hired a Chief Data Officer, Chief Digital Officer, and Chief Technology Officer.

The RNC's Data and Digital department employed approximately 42 employees in 2014, housed in the RNC's Washington D.C. headquarters and its tech-focused West Coast office in Silicon Valley.² DeFeo Aff. ¶ 6. The team includes 15 technology experts: six data analysts who write computer code to analyze the RNC's voter data; three data scientists who perform predictive analysis and modeling on the RNC's voter file data; and six data engineers who build tools that interact with the RNC's voter file. DeFeo Aff. ¶ 6. The department is headed by Chuck DeFeo and Azarias Reda. DeFeo Aff. ¶ 3. DeFeo is the RNC's Deputy Chief of Staff and Chief Digital Officer. Prior to his role at the RNC, he was the Senior Vice President for Edelman. Earlier in his career he managed the digital efforts for the Bush/Cheney 2004 re-election campaign, and oversaw data and technology projects for the U.S. Attorney General and

¹ See <http://www.parabellumlabs.com/whywork.html>.

² The RNC pays approximately \$6,500 per month to rent office space for its Silicon Valley Office. See Ex. E.

Department of Justice in 2001. Reda is the RNC's Chief Data Officer. He has a PhD in Computer Science Engineering from the University of Michigan. He was previously employed at LinkedIn, and was the founder of an enterprise software startup company.

In contrast to ADLF's allegations, the RNC's Digital & Data department maintains, operates, and administers its own voter file. DeFeo Aff. ¶ 7; *see* Complaint at 5, 13. The RNC captures data from many sources in addition to through its list exchange with the Data Trust, including via state party and candidate list exchanges, from state and local election officials, and from commercial list brokers. *Id.* ¶ 7. In 2014, the RNC spent approximately \$2.6 million on data enhancements and in-house data management. After data is captured, the RNC Data team sanitizes and formats it. For example, if the RNC purchases a list from the Florida Secretary of State that contains a voter named Mary Smith, and the RNC's voter file already contains a voter by the same name but at a different address, the RNC Data team must determine whether those two records identify the same or different persons. After the data is sanitized and formatted, the Digital & Data team performs quality control testing and remediation on an ongoing daily basis.

Not only is the Complaint faulty in its baseless conclusion that Data Trust manages the RNC's voter file, but it makes an even more fundamental error by conflating the RNC with the "GOP" or the "Republican Party." The RNC is neither. This obfuscation appears to be intentional since Brad Woodhouse, the signatory of the Complaint for ADLF, is a former senior official at the Democratic National Committee and Democratic Senatorial Campaign Committee³ and presumably is familiar with the difference between national committees of political parties and the political parties themselves. The RNC is a national committee of the Republican Party under 52 U.S.C. § 30101(14) exempt from income tax under section 527 of the Internal Revenue Service code, and is an unincorporated association governed by the rules adopted by the

³ See <http://www.americansunitedforchange.org/page/content/woodhouse>.

Republican National Convention. It is comprised by its 168 members, all of whom are part-time volunteers. Members consist of a national committeeman, national committeewoman, and state party chairman from each of the states and territories. Although the RNC is the national organization of the Republican Party, it is one of many Republican Party entities, including state and local parties, as well as many other Republican organizations operating on the national, state, and local level.

ADLF purports that the RNC "formed" Data Trust, *see* Complaint at 4, and misconstrues factually inaccurate media accounts to support its fallacious argument. But the reality is far different. In 2011, a group of Republican leaders, including one of the RNC's 168 volunteer members acting in his personal capacity, considering forming what would become the Data Trust, approached the RNC about entering into a list exchange agreement. The RNC has had, and does have, list exchange agreements in place with many other entities, including state party committees, candidate committees, and other organizations. List exchange agreements such as these, which are common in the regulated community and within both major parties as well as minor parties, allow the contracting entities on both sides of the transaction to receive valuable enhancements to their data by paying for such enhancements with their own valuable data rather than money. These arrangements are of course explicitly endorsed by the Federal Election Commission (the "FEC" or "Commission"). *See* AO 2002-14 at 5; *see also* AO 1981-46 at 2. The RNC and the Data Trust entered their first such arrangement with each other in 2011.⁴ Per the terms of the agreement, the Data Trust would be provided access to a substantial portion of

⁴ The Data Trust is actually two separate entities: (1) The Data Trust, which is a Virginia business trust, and (2) GOP Data Trust, LLC. GOP Data Trust, LLC is a wholly owned subsidiary of The Data Trust. The RNC's list exchange agreement was entered into with The Data Trust, and its purchase of Data Beacon (discussed below) was through GOP Data Trust, LLC. For purposes of the RNC's response to the Complaint, the RNC refers to the two entities as one. The RNC acquired this information about Data Trust's legal structure in the course of negotiating the list exchange and other agreements referenced herein.

the RNC's voter file, and in exchange, the RNC would receive commercial data enhancements. The parties renewed this agreement in 2014.

In addition to its list exchange agreement, the RNC also had and continues to have a vendor relationship with the Data Trust. Although ADLF claims that the RNC has only paid \$25,000 to the Data Trust, like most of the allegations in the Complaint, this claim is false. In 2013, the Data Trust began developing a voter relationship management ("VRM") software package called Data Beacon. During the software's Beta testing period,⁵ the RNC agreed to lease the program; in exchange for making available to the RNC a Beta version of the software, the RNC agreed to pay a commercially reasonable fee of \$5,000 per month and provide expert user feedback on the functionality of the product to help the Data Trust develop a high-quality program that it could successfully market to Republican organizations, including the RNC. DeFeo Aff. ¶ 8. The RNC – and presumably the Data Trust – hoped and expected that the end product would provide a long-term data solution, for which the RNC and other Republican entities would pay a market rate license fee. By July 2014, however, the Data Trust decided that it was no longer interested in developing Data Beacon. As a result, the RNC purchased the unfinished Data Beacon from the Data Trust for the sales price of \$150,000. Ex. A. At the same time, the RNC also paid the Data Trust \$87,800 for engineering and consulting services to facilitate the transition. Ex. B. The RNC now engages an independent contractor, Scalable Research Consulting Inc., to complete Data Beacon, with payments to the firm totaling \$410,185.77 in 2014. Ex. C.⁶ The RNC also now licenses from the Data Trust an application program interface ("API") that works with Data Beacon and in 2014 paid the Data Trust \$60,000

⁵ Data Beacon, although still not a complete product, was early stages of development during the Beta testing period; Data Trust provided it to the RNC to test, which provided the developer with valuable input.

⁶ The RNC paid Scalable Research Consulting Inc. \$410,185.77 in 2014, but only \$255,706 of the expenditures are currently on the RNC's FEC reports. The remaining payments will be demonstrated on the RNC's year-end FEC report.

for the use of this API. Ex. D. Data Beacon, along with a program called GOP Data Center, is one of two VRM systems used by the RNC.

II. LEGAL ANALYSIS

The Commission "may find 'reason to believe *only if* a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the FECA. Complaints not based upon personal knowledge *must* identify a source of information that reasonably gives rise to a belief in the truth of the allegations presented." MUR 5878 (Arizona State Democratic Central Committee), Statement of Reasons of Vice Chairman Donald F. McGahn and Commissioners Caroline C. Hunter and Matthew S. Petersen, at 5; *see also* 11 C.F.R. § 111.4(d)(2). The Complaint fails to meet this minimum standard, instead relying upon inaccurate media accounts based upon anonymous quotes. While such tactics may be the tools of operatives like the signatory of this Complaint, they should have no credence in an enforcement action by the Commission.

A. The RNC has not received in-kind contributions from Data Trust.

The RNC has not received any in-kind contributions from the Data Trust because the RNC has always paid the usual and normal charge for the goods and services received from Data Trust. The ADLF's allegations seem to stem from a misunderstanding of the activities described, and are based on nothing more than inaccurate and misconstrued media accounts. Even more fundamentally, the complaint's assertion of illegal in-kind contributions depends entirely on its allegation that the RNC has paid the Data Trust only \$25,000 – a claim that is demonstrably false.

The Data Trust has provided two types of products and services to the RNC: technological and data. On the technological side, the Data Trust first provided a license to a

Beta version of a VRM software package, Data Beacon, and subsequently sold Data Beacon to the RNC. DeFeo Aff. ¶ 8. The Data Trust now licenses an API to the RNC. On the data side, the Data Trust provides enhanced list data (in exchange for the data of equal value that the RNC has provided to the Data Trust). *Id.* ¶ 8. The Complaint wrongly asserts that the RNC “made a single payment to the Data Trust in 2014 for \$25,000” and that “this amount does not accurately reflect the fair market value” of the services provided to the RNC. Complaint at 16. In fact, in addition to that \$25,000 for the initial Data Beacon license, the RNC paid the Data Trust \$237,800 in 2014 for the purchase of Data Beacon, an unfinished product, and related engineering and consulting services. *See* Ex. A; Ex. B. The RNC also pays a license fee to the Data Trust for the API, which in 2014 amounted to \$60,000. Ex. D.

Contrary to the ADLF's unfounded assertions, the Data Trust does not “maintain and control [the RNC's] entire voter file.” Complaint at 13. The RNC maintains and controls its own voter file. DeFeo Aff. ¶ 7. In fact, essentially all of the RNC's data team's time is spent on voter file management and maintenance. *Id.* ¶ 7. The RNC's in-house data and digital effort is designed to develop the most robust, accurate, and sophisticated voter file in the party's history, and to make that data available to other party committees and candidates, primarily through list exchange agreements for data of equal fair market value, in accordance with the requirements of FECA. The ADLF's suggestion that the RNC “decided to house its data operation in a for-profit company specifically so that other organizations could subsidize the high cost of such an operation,” Complaint at 17, ignores the fact that the RNC spends millions of dollars on its data operation and is clearly erroneous.

With respect to the second type of product or service that the Data Trust provides—the enhanced data that the RNC receives from the Data Trust—the RNC licenses a major portion of

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its voter file to the Data Trust in exchange for those enhanced records. The RNC has had list exchange agreements in place with Data Trust since 2011. In exchange for its voter list, the RNC receives enhanced consumer data and other data together valued at the same fair market value as the data it licenses to the Data Trust. In addition to its agreement with the Data Trust, the RNC has similar list exchange agreements in place with many other entities, including state party committees and candidate committees, while also acquiring data itself and through outside vendors. The Complaint fails to acknowledge that a national political party committee

may exchange its mailing lists or portions of its mailing lists of equal value with any outside organization, including political committees under the Act, Section 527 organizations (including state and local campaign, PAC, and party organizations), 501(c)(3) and (c)(4) groups, non-profit and for-profit corporations, and labor organizations, provided that the lists or the portions of the lists that are exchanged are of equal value. When such exchanges of equal value occur, which are non-reportable events under the Act, no 'contribution, donation, or transfer of funds or any other thing of value' takes place under 2 U.S.C 441i(a), 11 CFR 300.10(a), or any other provision of the Act or the Commission's regulations.

AO 2002-14 at 5.

The Complaint further alleges that because American Crossroads has paid the Data Trust more than the RNC has, it necessarily follows that the Data Trust provided services to the RNC at a discount. Complaint at 16-17. The RNC does not know how much American Crossroads has paid the Data Trust. But according to this logic, the Commission should launch an investigation every time a vendor appears on multiple committees' disclosure reports with different disbursement amounts. Common sense, of course, allows for the reality that different committees pay for different services, and a vendor obviously must charge different amounts – for both commercial and legal reasons – when the market value of one is higher than that of another. Indicative of the Complaint's unreliability are its false statements about the goods and services provided by the Data Trust to the RNC and the amount that the RNC paid the Data Trust

for those goods and services. Because the Complaint simply cannot overcome its misstatement of amounts paid, its misunderstanding of services provided, and its failure to consider Commission precedent, the Commission must find no reason to believe that the RNC received an excessive contribution from the Data Trust.

B. The RNC did not engage in illegal coordination through Data Trust and i360.

ADLF makes sweeping and unspecific accusations of rampant "coordination" based on more factual inaccuracies and without pointing to a single particular communication that was supposedly coordinated with the RNC. The Complaint alleges that "[c]ustomers [of the Data Trust] don't have to wait for non-public information provided by the Trust to be shared between them, as the most recent upgrade allows that information to be shared in real time," and repeatedly cites to the purported "real time" updating, downloading, or tracking of data. Complaint at 14. First, there is no legal significance to whether data is exchanged in real time or periodically, nor does ADLF specifically claim any significance. But this real-time exchange is another inaccurate assertion based on a speculative media account that does not quote anyone with first-hand knowledge of how Data Trust operates. In reality, the data exchanges are periodic and not in real time. The Complaint also alleges that the Data Trust provides voter identification and list development services to the RNC and guesses that the Data Trust "is providing the exact same IDs and lists to outside groups." Complaint at 13-14. ADLF misunderstands the law and the facts. Data Trust does not provide list management services for the RNC (nor does ADLF even explain what it means by "list management services"). And while the RNC has no direct knowledge of whether the Data Trust provides similar lists to other organizations as it does to the RNC, there is nothing remotely remarkable or illegal about a list or data vendor providing the same data to multiple clients. Moreover, there is nothing improper

about the RNC receiveing data from the Data Trust since the RNC pays fair market value for the information via its list exchange agreement.

A communication is coordinated when the communication (1) “[i]s paid for . . . by a person other than the candidate, authorized committee, or political party committee;” (2) satisfies the content standard; and (3) satisfies the conduct standard. *See* 11 C.F.R. 109.21(a)(1)-(3). The Complaint does not even identify a single communication paid for by a person other than the RNC; allege that the Data Trust created, produced or distributed any such communication; or identify any material information from the RNC used in such a communication. Thus, the Complaint fails to even make specific allegations as to any of the three prongs. “The Commission may find ‘reason to believe *only if* a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the FECA. Complaints not based upon personal knowledge *must* identify a source of information that reasonably gives rise to a belief in the truth of the allegations presented.” MUR 5878 (Arizona State Democratic Central Committee), Statement of Reasons of Vice Chairman Donald F. McGahn and Commissioners Caroline C. Hunter and Matthew S. Petersen, at 5; *see also* 11 C.F.R. 111.4(d). The Complaint fails to meet this pleading standard, relying instead on the following legally flawed syllogism: American Crossroads, Crossroads GPS, Americans for Prosperity and “presumably other outside groups supportive of the Republican Party” were clients of the Data Trust and/or i360, and the RNC was a client of the Data Trust, and therefore all of the independent expenditures by these groups were “coordinated” with the RNC.

The Complaint does not point to a single communication that purportedly satisfies the content prong. Moreover, it is the RNC’s understanding that the Data Trust does not even participate in the creation, production, or distribution of communications. Thus, even if a

communication did satisfy both the payment and content prongs of the Commission's coordination regulations, the conduct prong is not met because the Data Trust is not a "common vendor" as that term has been defined by the FEC in its own regulations.

11 C.F.R. 109.21(d)(4) explains that the "conduct" prong of the coordination regulation is satisfied if "the person paying for the communication, or an agent of such person, contracts with or employs a commercial vendor to create, produce, or distribute the communication," and that commercial vendor has provided any of the enumerated services during the previous 120 days to the candidate who is clearly identified in the communication, or the candidate's authorized committee, or a political party committee.

As an initial matter, the Data Trust is not an agent of the RNC because it has no authority to engage in any of the enumerated activities on the RNC's behalf, as the Complainant implicitly acknowledges by relying on a "common vendor" theory of coordination. Further, no past Commission enforcement matters of which we are aware consider a vendor who did not "create, produce, or distribute" communications because the regulations simply do not allow for it. Instead, they have considered situations where the vendor in question could potentially fall within the scope of the regulation based on their creation, production, or distribution of identified communications. See e.g., MUR 5502 (Martinez for Senate), First General Counsel's Report, Feb. 14, 2005; MUR 5598 (John Swallow for Congress), First General Counsel's Report, July 21, 2006. The Data Trust cannot be a common vendor as defined in 11 C.F.R. 116.1(c), since it did not, to the RNC's knowledge, "create, produce, or distribute" communications under the commission's regulations. And even if the Data Trust were a "common vendor," no information about the RNC's campaign plans, projects, activities, or needs, that could be material to the creation, production, or distribution of any public communication, was conveyed by the Data

Trust to any other person, nor could it have been since the RNC has never shared such information with the Data Trust.⁷ Finally, the Data Trust does not provide any of the enumerated services listed in 11 C.F.R. 109.21(d)(4) to the RNC. In fact, the RNC has no basis for believing that the Data Trust even offers these services.

The Complaint cobbles together allegations based on unattributed and often unsupported conclusions selectively picked from various media accounts. Many of the unattributed quotes are wrong and not based on reality. Where the Complaint points to attributed quotes, it attempts to find impropriety where none exists. For example, it cites a few quotes by an RNC spokesperson: "the platform is the way the Party is going to create an open data environment to give Republican data users more access to the RNC's premier data warehouse." Complaint at 5. The Complaint also refers to a quote by the spokesperson which stated that "[a]ny time we are having a conversation with voters, we want to have that information and share that with everyone on our side." Complaint at 5. These statements about the RNC's aspirations for the future of the Republican data environment simply rest on a list exchange agreement the RNC has in place with the Data Trust, and such exchanges have been validated by the Commission. See AO 2002-14 at 5. Although information is shared or enhanced, the clients are unable to determine where new data originated, who has used the information, or the date it was collected. Although the Data Trust provides raw information about voters to the RNC through the exchange agreement, as does the RNC to the Data Trust, neither tells the other how to target voters. In fact, the RNC has its own operation to do this and makes its own decisions about how to use the data it receives from the Data Trust. The Data Trust does not suggest which voter characteristics the RNC should use; nor does the RNC make such suggestions to the Data Trust. The RNC receives and

⁷ Because the RNC did not coordinate with the Data Trust, it follows that the RNC did not coordinate with i360. The RNC has absolutely no affiliation with i360.

transmits only data through the exchange; it does not pass on political strategy or strategic information. The same is true for the Data Trust. Because the Data Trust is not a "common vendor" under Commission regulations and has never had access to and thus never conveyed information about the RNC's plans, projects, activities, or needs that could be material to any communication (and no communications have even been identified), there can be no reason to believe that the RNC engaged in or benefitted from illegal coordination.

C. The RNC did not establish, and has never financed, maintained, or controlled the Data Trust.

For good measure, ADLF tacks on an allegation that the RNC somehow established the Data Trust or that it maintains or controls it. But here too ADLF's rhetoric cannot overcome the factual and legal reality. In determining whether a national party committee has established, financed, maintained, or controlled another organization, the Commission examines the factors set forth in 11 C.F.R. 300.2(c). These factors "must be examined in the context of the overall relationship between the sponsor and the entity to determine whether the presence of any factor or factors is evidence that the sponsor directly or indirectly established, finances, maintains, or controls the entity." 11 C.F.R. 300.2(c)(2). In other words, "the Commission performs a 'totality of the evidence' analysis." MUR 4953 (National Republican Congressional Committee, et al), First General Counsel's Report, May 21, 2003, at 14.

The reality is that the RNC did not establish, and has never financed, maintained or controlled the Data Trust. The Complaint rests upon media accounts that rely on un-sourced assertions and quotes from un-named sources to make broad-brush accusations. The only factors of the regulation that ADLF cites are 11 C.F.R. 300.2(c)(2)(vi) and (ix). According to the Complainant, the RNC "had an active or significant role in the formation of the" Data Trust. See Complaint at 17-18; 11 C.F.R. 300.2(c)(2)(ix). The only evidence offered by the Complainant of

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this allegation is an un-sourced quote from a "media account" that the Complainant fails to cite, and an allegation that the Data Trust's website contains the logos of the RNC, National Republican Congressional Committee, and the National Republican Senatorial Committee. See Complaint at 18. These un-sourced media accounts are inaccurate. The RNC did not create the Data Trust, and the Complainant offers no evidence to suggest it did. In 2011 the RNC was approached by a group of individuals who were considering forming the Data Trust about entering into a list exchange agreement. The RNC decided to enter into such an agreement. While Mike Duncan, in his personal capacity, did have a role in the formation of the Data Trust and once served as its Chairman, his tenure as RNC Chairman had ended more than two years before he helped form the Data Trust, and as one of its 168 volunteer members, Duncan had no authority to act as an agent of the RNC.

With respect to the RNC's logo appearing on the Data Trust website, this was done without the RNC's permission. Upon learning of its use, the RNC followed its usual policy and requested that the Data Trust remove the logo. As stated in the Complaint, the logos of the NRCC and the NRSC were also on the Data Trust website. This is indicative of the fact that the Data Trust serves the larger Republican community, and likely used the names of the political committees for advertising purposes, not because of any special relationship between the RNC and the Data Trust.

ADLF also alleges that the RNC "controls" the Data Trust because the Data Trust "has officers who used to be officers of the [RNC], indicating a formal or ongoing relationship" between the RNC and the Data Trust. Complaint at 18. Although the Data Trust has had "members, officers, or employees who were members, officers, or employees" of the RNC, such overlap is insufficient to meet even this single factor of the test where, as here, that overlap does

not indicate a "formal or ongoing relationship" between the RNC and Data Trust. 11 C.F.R. 300.2(c)(2)(iv). The ADLF's assertion that "[k]ey members of the Republican Party infrastructure were selected for high ranking positions at the Data Trust" does not amount to an indication that the RNC established, financed, maintains or controls the Data Trust.⁸ RNC or DNC members, let alone former Chairs of party committees, need not sit on the sidelines and forgo business opportunities that involve politics. Indeed, the Commission's Office of General Counsel ("OGC") has recognized the absurdity of using these kinds of "professional ties" that many people in politics have with other political participants as the basis for an investigation. MUR 5338 (Common Cause, et al), First General Counsel's Report, March 27, 2003, at 18, 23. The "professional ties" the Complainant points to here similarly do not constitute any sort of basis for a reason to believe that the RNC established, financed, maintained, or controlled the Data Trust is absurd.

Perhaps aware of the deficiencies in his allegations, the Complainant shades the truth (to be charitable) significantly by conflating the RNC with "the Republican Party infrastructure." Complaint at 4. For example, the Complaint notes that the president of the Data Trust "is a former high ranking aide to John Boehner, and the former deputy executive director of the [NRCC]." Complaint at 4. However, John Boehner is not an officer or employee of the RNC, nor is the Data Trust's president, and the RNC and NRCC are distinct legal entities with different officers and members with different missions. Second, the Complaint points out that the former chairman of the RNC has served as the chairman of the Data Trust, but that alone is insufficient to indicate a formal relationship that would meet one of the factors in the totality-of-the-

⁸ If this were an indication of establishing, financing, maintenance, or control, then the operations of Catalist, a for-profit data company founded by long-time Democratic National Committee member Harold Ickes whose clients include numerous Democratic party committees and candidates along with liberal independent expenditure and issue groups would expose Catalist and its many Democratic and liberal clients to liability.

circumstances test in assessing whether the RNC established, financed, maintains, or controls the Data Trust.

In MUR 5338, the OGC considered the relationships between the allegedly sponsored entity, the Leadership Forum, the NRCC, and the House Republican Leadership, and noted that the relationships in this situation “[were] not insubstantial” (one former chairman of the NRCC, two former NRCC staff, one who has provided legal representation to both the Forum and the NRCC). *Id.* at 16-17. OGC, however, concluded that “something more than the mere fact of [] informal, ongoing relationships between the personnel of a potentially sponsoring and potentially sponsored entity is necessary to support a conclusion of ‘establishment, financing, maintenance, or control.’” *Id.* at 17 - 18.

The RNC is an unincorporated association of 168 members. The members consist of a national committeeman, national committeewoman, and state party chairman from each of the states and territories. The former Chairman of the Data Trust is Mike Duncan, an RNC member, national committeeman from Kentucky, and former RNC Chairman. All RNC members serve in a volunteer capacity, as does Duncan. Having an RNC member serve as part of the Data Trust is hardly evidence in support of a finding that the RNC established, or finances, maintains, or controls the entity. During his tenure with the Data Trust, Duncan was not only a volunteer RNC member, but also led other businesses and organizations. On multiple occasions and in various contexts, the Commission has concluded that one person can wear multiple hats allowing them to engage in an activity in one capacity that such person would be prohibited from doing in another capacity.

In AO 2007-05, for example, the Commission concluded that a federal officeholder’s chief of staff was not prohibited from soliciting, directing, and spending non-federal funds on

behalf a state political party committee, provided that such activities were undertaken on behalf of the state party and not the officeholder or the officeholder's campaign committee. The Commission explained that although the Act prohibits *agents* of federal candidates and officeholders from soliciting, receiving, directing, transferring or spending funds in connection with an election for non-federal office, because the Chief of Staff "received no express instruction from [the federal officeholder] that he is the Congressman's agent for fundraising purposes, nor has the Congressman's conduct caused the [Chief of Staff] to believe that he is the Congressman's agent for such purposes," the Chief of Staff's role "does not include any actual authority, express or implied, to raise or spend campaign funds, and he is not an agent of [the] Congressman [] under 11 C.F.R. 300.2(b)(3)." AO 2007-05 at 3. The Commission further concluded that even if the Chief of Staff was a fundraising agent of the Congressman, he was nevertheless not prohibited from raising non-federal funds, provided that the solicitations were made "in his own capacity and exclusively on behalf of the State committee, and not on the authority of any Federal candidate or officeholder." AO 2007-05 at 4, citing AO 2003-10. Similarly, in AO 2004-25, the Commission reiterated that "the plain language of both the Act and Commission's regulations specifically limit application of [the soft money ban] to national party committee officers and agents only when such individuals are *acting on behalf of* the national party committee," in concluding that the chairman of the Democratic Senatorial Campaign Committee was not prohibited from donating his personal funds to voter registration organizations. AO 2004-25 at 2 (emphasis in original); *see also* AO 2013-03 (concluding that a candidate for federal office was not prohibited from serving as a paid consultant to an organization that is not registered with the FEC and raises and spends non-federal funds.)

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The Complaint points to no evidence that the RNC established the Data Trust, or that it has ever financed, maintained, or controlled the Data Trust. Instead it relies on speculative media reports. Moreover, the Complaint does not attempt to apply the factors enumerated in 11 C.F.R. 300.2(c), and only even references two of the ten factors of the regulation. Under any definition of the term, there is no evidence that the RNC established or has ever financed, maintained, or controlled the Data Trust. 11 C.F.R. 300.2(c)(2). To the contrary, the evidence, as set forth herein and by sworn affidavit, demonstrates the complete lack of establishment, financing, maintenance or control – or of any other violation of the Act.

III. CONCLUSION

This politically motivated Complaint, filed days before the 2014 election, woefully fails to meet the Commission's pleading standard. It throws a lot against the wall – and names just about every Republican the Complainant can think of – but nothing can stick. It offers no evidence of violations of the law by the RNC or anyone else, and instead relies on erroneous legal theories, inaccurate facts, and media opinion pieces relying on anonymous and uninformed sources. The RNC and the Data Trust have a vendor relationship in which the RNC paid fair market value for a VRM system, and an agreement for the exchange of data of equal fair market value, the legality of which is clear in Commission precedent.

The Complaint does not allege a single communication that supports the content prong of the coordination regulation, nor does the Data Trust create, produce, or distribute communications. Moreover, the conduct prong is not satisfied because the Data Trust is not a "common vendor."

With respect to the assertion that the RNC established, finances, maintains, or controls the Data Trust, the Complaint offers no evidence to support this conclusory allegation other than

speculative media accounts based on anonymous quotes and the fact that some individuals associated with the Data Trust are also connected with the RNC. But there is nothing improper, much less illegal, about such mutual associations. For the reasons above, the Commission must find no reason to believe the RNC has committed any violation and dismiss the Complaint.

Sincerely,



John R. Phillippe Jr.
Chief Counsel

David Powers
Senior Counsel

EXHIBIT

A

100-450-1-10

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

21b 27
 22 28a
 23 28b
 24 28c
 25 29
 26 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. GOP DATA TRUST LLC		Date of Disbursement
Mailing Address PO BOX 12385		07 / 10 / 2014
City	State	Zip Code
ARLINGTON	VA	22219
Purpose of Disbursement	Category/ Type	Transaction ID : 2014M08L2100370
SOFTWARE PURCHASE		Amount of Each Disbursement this Period
Candidate Name		150000.00
Office Sought:	Disbursement For:	
<input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State:	District:	

B. SMARTECH CORPORATION		Date of Disbursement
Mailing Address AIRNET 801 BROAD STREET, SUITE 530		07 / 10 / 2014
City	State	Zip Code
CHATTANOOGA	TN	37402
Purpose of Disbursement	Category/ Type	Transaction ID : 2014M08L2100373
DATA SERVICES		Amount of Each Disbursement this Period
Candidate Name		12950.01
Office Sought:	Disbursement For:	
<input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State:	District:	

C. MATTHEW ALBERS		Date of Disbursement
Mailing Address 9807 EMERALD LINKS DRIVE		07 / 11 / 2014
City	State	Zip Code
TAMPA	FL	33626
Purpose of Disbursement	Category/ Type	Transaction ID : 2014M08L2100375
STIPEND		Amount of Each Disbursement this Period
Candidate Name		200.00
Office Sought:	Disbursement For:	
<input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State:	District:	

SUBTOTAL of Disbursements This Page (optional).....▶	163150.01
TOTAL This Period (last page this line number only).....▶	

110841M08L2100375

EXHIBIT

B

14004490-1-100

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

21b 22 23 24 25 26
 27 28a 28b 28c 29 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)
A. LORI FRANSEN

Mailing Address **11033 PARKLAND DR**

City **TRUCKEE** State **CA** Zip Code **96161**

Purpose of Disbursement
TRAVEL EXPENSES

Candidate Name

Office Sought: House Senate President
 Disbursement For: Primary General
 Other (specify) ▼

State: District:

Date of Disbursement
07 / 02 / 2014

Transaction ID : **2014M08L2100082**

Amount of Each Disbursement this Period
1202.79

Full Name (Last, First, Middle Initial)
B. GOP DATA TRUST LLC

Mailing Address **PO BOX 12365**

City **ARLINGTON** State **VA** Zip Code **22219**

Purpose of Disbursement
IT SUPPORT/MAINTENANCE

Candidate Name

Office Sought: House Senate President
 Disbursement For: Primary General
 Other (specify) ▼

State: District:

Date of Disbursement
07 / 02 / 2014

Transaction ID : **2014M08L2100083**

Amount of Each Disbursement this Period
87800.00

Full Name (Last, First, Middle Initial)
C. INFO GROUP

Mailing Address **PO BOX 3243**

City **OMAHA** State **NE** Zip Code **68103**

Purpose of Disbursement
LIST ACQUISITION

Candidate Name

Office Sought: House Senate President
 Disbursement For: Primary General
 Other (specify) ▼

State: District:

Date of Disbursement
07 / 02 / 2014

Transaction ID : **2014M08L2100085**

Amount of Each Disbursement this Period
2274.89

SUBTOTAL of Disbursements This Page (optional).....▶ **91277.68**

TOTAL This Period (last page this line number only).....▶ **91277.68**

1100450001-110

19004304001

EXHIBIT

C

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
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Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. SCALABLE RESEARCH CONSULTING		Date of Disbursement
Mailing Address 1017 EL CAMINO REAL #279		08 / 04 / 2014
City REDWOOD CITY	State CA	Zip Code 94083
Purpose of Disbursement: IT SUPPORT/MAINTENANCE	Candidate Name	Transaction ID : 2014M09L2100073
Category/Type		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State: District:		

B. SOUTHWEST PUBLISHING AND MAILING CORPORATION		Date of Disbursement
Mailing Address 4000 SE ADAMS STREET		08 / 04 / 2014
City TOPEKA	State KS	Zip Code 66609
Purpose of Disbursement: POSTAGE	Candidate Name	Transaction ID : 2014M09L2100074
Category/Type		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State: District:		

C. ACADEMY DOOR & CONTROL CORP		Date of Disbursement
Mailing Address 3831 AVION PARK COURT SUITE C-104		08 / 08 / 2014
City CHANTILLY	State VA	Zip Code 20151
Purpose of Disbursement: BUILDING MAINTENANCE	Candidate Name	Transaction ID : 2014M09L2100076
Category/Type		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State: District:		

SUBTOTAL of Disbursements This Page (optional).....▶	88237.37
TOTAL This Period (last page this line number only).....▶	

14970889867

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. SCALABLE RESEARCH CONSULTING

Mailing Address 1017 EL CAMINO REAL
#279

City REDWOOD CITY State CA Zip Code 94063

Purpose of Disbursement
IT SUPPORT/MAINTENANCE

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General
 Other (specify) ▼

State: District:

Date of Disbursement

08 / 21 / 2014

Transaction ID : 2014M09L2100979

Amount of Each Disbursement this Period

40555.00

Full Name (Last, First, Middle Initial)

B. SOUTHWEST PUBLISHING AND MAILING CORPORATION

Mailing Address 4000 SE ADAMS STREET

City TOPEKA State KS Zip Code 66609

Purpose of Disbursement
POSTAGE

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General
 Other (specify) ▼

State: District:

Date of Disbursement

08 / 21 / 2014

Transaction ID : 2014M09L2100981

Amount of Each Disbursement this Period

265827.14

Full Name (Last, First, Middle Initial)

C. JASON BERLINSKY

Mailing Address 179 TRANSIT STREET
Floor 3

City PROVIDENCE State RI Zip Code 02908

Purpose of Disbursement
MANAGEMENT CONSULTING SERVICES

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General
 Other (specify) ▼

State: District:

Date of Disbursement

08 / 22 / 2014

Transaction ID : 2014M09L2100985

Amount of Each Disbursement this Period

2035.00

SUBTOTAL of Disbursements This Page (optional)..... ▶

TOTAL This Period (last page this line number only)..... ▶

308417.14

10031001-10031001

PO BOX 1214 ALEXANDRIA, Virginia 22313	TELEMARKETING	10015.50
PEPCO PO BOX 13608 PHILADELPHIA, Pennsylvania 191013608		09/10/2014
	UTILITIES	226.67
PREFERRED PARKING PO BOX 670902 DALLAS, Texas 75367		09/10/2014
	VALET SERVICES	378.88
PRIDE SHEETMETAL INC PO BOX 263 LOTHIAN, Maryland 20711		09/10/2014
	BUILDING MAINTENANCE	4260.00
LINDSAY REYNOLDS 2106 CONVENT LANE CINCINNATI, Ohio 45208		09/10/2014
	FUNDRAISING SERVICES	570.00
SCALABLE RESEARCH CONSULTING 1017 EL CAMINO REAL #279 REDWOOD CITY, California 94063		09/10/2014
	IT SUPPORT/MAINTENANCE	35000.00
SCHINDLER ELEVATOR CORPORATION P O BOX 93050 CHICAGO, Illinois 606733050		09/10/2014
	EQUIPMENT MAINTENANCE	641.46
SECURITAS SECURITY SERVICES P.O. BOX 403412 ATLANTA, Georgia 303843412		09/10/2014
	SECURITY SERVICES	5239.93
KELSEY SHANNON 221 CHURCH STREET WILLIAMSTON, New Jersey 08094		09/10/2014
	MANAGEMENT CONSULTING SERVICES	1500.00
SMARTECH CORPORATION AIRNET 801 BROAD STREET, SUITE 530 CHATTANOOGA, Tennessee 37402		09/10/2014
	PHONE SERVICES	6672.42
SMF LLC 107 S. WEST STREET #700 ALEXANDRIA, Virginia 22314		09/10/2014
	MAIL PROCESSING SERVICES	3683.46

1106047M09-11-2014

13195 FREEDOM WAY BOSTON, Virginia 22713		
GREATER SANFORD REGIONAL COC 400 EAST FIRST STREET SANFORD, Florida 32771		09/19/2014
	REGISTRATION FEE	175.00
RHA MARKETING LLC 6910 CRESTWOOD BLVD FREDERICK, Maryland 21703		09/19/2014
	POSTAGE	4870.76
SCALABLE RESEARCH CONSULTING 1017 EL CAMINO REAL #279 REDWOOD CITY, California 94063		09/19/2014
	IT SUPPORT/MAINTENANCE	40215.89
USPS ACCOUNTING SERVICE CENTER 2700 CAMPUS DRIVE SAN MATEO, California 94497		09/19/2014
	POSTAGE	100000.00
BRANCH BANKING & TRUST 1909 K STREET NW 2ND FLOOR WASHINGTON, DC 20006		09/22/2014
	BANK FEES	6873.91
AJUUA 14150 E.LLIFF AVE AURORA, Colorado 80014		09/23/2014
	CATERING/FOOD AND BEVERAGE	422.40
CORPORATE PRESS INC 9700 PHILADELPHIA COURT LANHAM, Maryland 20706		09/23/2014
	POSTAGE	90709.72
RST MARKETING ASSOCIATES INC 1272 CORPORATE PARK DRIVE FOREST, Virginia 24551		09/23/2014
	POSTAGE	18893.12
ADP INC PO BOX 842875 BOSTON, Massachusetts 022842875		09/24/2014
	PAYROLL SERVICES	903.00
ALAMEDA COUNTY REGISTRAR PHILLIP CABLE 1255 FALLON STREET, SUITE G-1 OAKLAND, California 94612		09/24/2014
	VOTER FILE MAINTENANCE	360.00
AMERICAN EXPRESS		09/24/2014

119944161-1-214

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. PIRYX INC

Mailing Address 144 2ND ST
1ST FL

City SAN FRANCISCO State CA Zip Code 94105

Purpose of Disbursement
BANK CARD SERVICE FEES

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify)

State: District:

Date of Disbursement

10 / 31 / 2014

Transaction ID : 2014G30L2100422

Amount of Each Disbursement this Period

217.08

B. SCALABLE RESEARCH CONSULTING

Mailing Address 1017 EL CAMINO REAL
#279

City REDWOOD CITY State CA Zip Code 94083

Purpose of Disbursement
IT SUPPORT/MAINTENANCE

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify)

State: District:

Date of Disbursement

10 / 31 / 2014

Transaction ID : 2014G30L2100427

Amount of Each Disbursement this Period

5151.30

C. SOUTH CAROLINA DEPARTMENT OF REVENUE WITHHOLDING

Mailing Address REGISTRATION UNIT

City COLUMBIA State SC Zip Code 29214-0004

Purpose of Disbursement
TAXES

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify)

State: District:

Date of Disbursement

10 / 31 / 2014

Transaction ID : 2014G30L2100428

Amount of Each Disbursement this Period

590.95

SUBTOTAL of Disbursements This Page (optional).....▶

TOTAL This Period (last page this line number only).....▶

5959.33

1100210101-1-1-110

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 10775 OF 11162

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. HOMEAWAY.COM INC		Date of Disbursement
Mailing Address 1011 W FIFTH ST SUITE 300		11 / 21 / 2014
City AUSTIN	State TX	Zip Code 78703
Purpose of Disbursement TRAVEL EXPENSES	Category/ Type	Transaction ID : 2014G30L2101057M
Candidate Name		Amount of Each Disbursement this Period 2175.00
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	[MEMO ITEM]
State: District:		

B. SCALABLE RESEARCH CONSULTING		Date of Disbursement
Mailing Address 1017 EL CAMINO REAL #279		11 / 21 / 2014
City REDWOOD CITY	State CA	Zip Code 94083
Purpose of Disbursement IT SUPPORT/MAINTENANCE	Category/ Type	Transaction ID : 2014G30L2101059
Candidate Name		Amount of Each Disbursement this Period 35000.00
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State: District:		

C. AMERICAN EXPRESS		Date of Disbursement
Mailing Address P O BOX 981532		11 / 24 / 2014
City EL PASO	State TX	Zip Code 79998
Purpose of Disbursement BANK CARD SERVICE FEES	Category/ Type	Transaction ID : 2014G30L2101080
Candidate Name		Amount of Each Disbursement this Period 8653.40
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State: District:		

SUBTOTAL of Disbursements This Page (optional).....▶	43653.40
TOTAL This Period (last page this line number only).....▶	

11002410001

10047161-1-288

EXHIBIT

D

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial) A. FRAGER'S HARDWARE		Date of Disbursement 10 / 29 / 2014
Mailing Address 1115 PENNSYLVANIA AVE SE		Transaction ID : 2014G30L2100288
City WASHINGTON	State DC	Zip Code 20003
Purpose of Disbursement OFFICE SUPPLIES	Candidate Name	Amount of Each Disbursement this Period 42.83
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Category/ Type
State: District:		

Full Name (Last, First, Middle Initial) B. BOB GOODLATTE FOR CONGRESS COMMITTEE		Date of Disbursement 10 / 29 / 2014
Mailing Address 4208 BRAMBLETON AVE		Transaction ID : 2014G30L2100289
City ROANOKE	State VA	Zip Code 24018
Purpose of Disbursement RENT	Candidate Name	Amount of Each Disbursement this Period 526.25
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Category/ Type
State: District:		

Full Name (Last, First, Middle Initial) C. GOP DATA TRUST LLC		Date of Disbursement 10 / 29 / 2014
Mailing Address PO BOX 12365		Transaction ID : 2014G30L2100290
City ARLINGTON	State VA	Zip Code 22219
Purpose of Disbursement IT SUPPORT/MAINTENANCE	Candidate Name	Amount of Each Disbursement this Period 45000.00
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Category/ Type
State: District:		

SUBTOTAL of Disbursements This Page (optional).....▶	45569.08
TOTAL This Period (last page this line number only).....▶	

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**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. FLS CONNECT LLC

Mailing Address 7300 HUDSON BLVD
SUITE 270

City SAINT PAUL State MN Zip Code 55128

Purpose of Disbursement
TELEMARKETING

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify)

State: District:

Date of Disbursement

11 / 19 / 2014

Transaction ID : 2014G30L2100839

Amount of Each Disbursement this Period
62629.11

B. FULL HOUSE EVENTS LLC

Mailing Address PO BOX 409

City OLDWICK State NJ Zip Code 08858

Purpose of Disbursement
FUNDRAISING SERVICES

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify)

State: District:

Date of Disbursement

11 / 19 / 2014

Transaction ID : 2014G30L2100859

Amount of Each Disbursement this Period
7500.00

C. GOP DATA TRUST LLC

Mailing Address PO BOX 12365

City ARLINGTON State VA Zip Code 22219

Purpose of Disbursement
IT SUPPORT/MAINTENANCE

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify)

State: District:

Date of Disbursement

11 / 19 / 2014

Transaction ID : 2014G30L2100860

Amount of Each Disbursement this Period
15000.00

SUBTOTAL of Disbursements This Page (optional).....▶

TOTAL This Period (last page this line number only).....▶

85129.11

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1000410001

EXHIBIT

E

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
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Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (in Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. BLUEPRINT COMMUNICATIONS

Mailing Address 127 S. PEYTON STREET
SUITE 200

City ALEXANDRIA State VA Zip Code 22304

Purpose of Disbursement
MEDIA SERVICES

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

01 / 29 / 2014

Transaction ID : 2014M02L21A00080

Amount of Each Disbursement this Period

1250.00

Full Name (Last, First, Middle Initial)

B. BOREL ESTATE COMPANY

Mailing Address 1700 S. EL CAMINO REAL

City SAN MATEO State CA Zip Code 94402

Purpose of Disbursement
RENT

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

01 / 03 / 2014

Transaction ID : 2014M02L21A00081

Amount of Each Disbursement this Period

6286.00

Full Name (Last, First, Middle Initial)

C. BORGER MANAGEMENT INC

Mailing Address HILL HOUSE
110 D STREET SE

City WASHINGTON State DC Zip Code 20003

Purpose of Disbursement
RENT

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

01 / 03 / 2014

Transaction ID : 2014M02L21A00082

Amount of Each Disbursement this Period

2050.00

SUBTOTAL of Disbursements This Page (optional).....▶

TOTAL This Period (last page this line number only).....▶

9586.00

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)

Grid for line numbers: 21b (checked), 22, 23, 24, 25, 26, 27, 28a, 28b, 28c, 29, 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. BMD

Date of Disbursement

Mailing Address INTELLEGENT DIRECT MARKETING
1420 KING STREET, SUITE 600

02 / 26 / 2014

City ALEXANDRIA State VA Zip Code 22314

Transaction ID : 2014M03L21A00136

Purpose of Disbursement MAIL PRODUCTION SERVICES

Amount of Each Disbursement this Period

Candidate Name

Category/ Type

10199.18

Office Sought: House, Senate, President
Disbursement For: Primary, General, Other (specify)

State: District:

B. BORGER MANAGEMENT INC

Date of Disbursement

Mailing Address 110 D STREET SE

02 / 03 / 2014

City WASHINGTON State DC Zip Code 20003

Transaction ID : 2014M03L21A00137

Purpose of Disbursement RENT

Amount of Each Disbursement this Period

Candidate Name

Category/ Type

2050.00

Office Sought: House, Senate, President
Disbursement For: Primary, General, Other (specify)

State: District:

C. BOREL ESTATE COMPANY

Date of Disbursement

Mailing Address 1700 S. EL CAMINO REAL

02 / 03 / 2014

City SAN MATEO State CA Zip Code 94402

Transaction ID : 2014M03L21A00138

Purpose of Disbursement RENT

Amount of Each Disbursement this Period

Candidate Name

Category/ Type

6286.00

Office Sought: House, Senate, President
Disbursement For: Primary, General, Other (specify)

State: District:

SUBTOTAL of Disbursements This Page (optional)

18535.18

TOTAL This Period (last page this line number only)

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. BMD		Date of Disbursement	
Mailing Address INTELLEGENT DIRECT MARKETING 1420 KING STREET, SUITE 800		04 / 09 / 2014	
City ALEXANDRIA	State VA	Zip Code 22314	Transaction ID : 2014M05L21A00181
Purpose of Disbursement MAIL PRODUCTION SERVICES	Candidate Name		Amount of Each Disbursement this Period 61086.36
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Category/ Type
State:	District:		

B. BORGER MANAGEMENT INC		Date of Disbursement	
Mailing Address 110 D STREET SE		04 / 02 / 2014	
City WASHINGTON	State OC	Zip Code 20003	Transaction ID : 2014M05L21A00192
Purpose of Disbursement RENT	Candidate Name		Amount of Each Disbursement this Period 2050.00
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Category/ Type
State:	District:		

C. BOREL ESTATE COMPANY		Date of Disbursement	
Mailing Address 1700 S. EL CAMINO REAL		04 / 02 / 2014	
City SAN MATEO	State CA	Zip Code 94402	Transaction ID : 2014M05L21A00193
Purpose of Disbursement RENT	Candidate Name		Amount of Each Disbursement this Period 6288.00
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Category/ Type
State:	District:		

SUBTOTAL of Disbursements This Page (optional).....▶	69422.36
TOTAL This Period (last page this line number only).....▶	

1100041280945

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
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Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. BORGER MANAGEMENT INC

Mailing Address 110 D STREET SE

City WASHINGTON State DC Zip Code 20003

Purpose of Disbursement
RENT

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

05 / 01 / 2014

Transaction ID : 2014M06 L2100001

Amount of Each Disbursement this Period

2050.00

Full Name (Last, First, Middle Initial)

B. BOREL ESTATE COMPANY

Mailing Address 1700 S. EL CAMINO REAL

City SAN MATEO State CA Zip Code 94402

Purpose of Disbursement
RENT

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

05 / 01 / 2014

Transaction ID : 2014M06 L2100002

Amount of Each Disbursement this Period

6286.00

Full Name (Last, First, Middle Initial)

C. BRING IT BACK PRODUCTIONS

Mailing Address 2275 WALNUT GROVE RD

City BOLIVAR State TN Zip Code 38008

Purpose of Disbursement
ENTERTAINMENT SERVICES

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

05 / 01 / 2014

Transaction ID : 2014M06 L2100003

Amount of Each Disbursement this Period

500.00

SUBTOTAL of Disbursements This Page (optional).....▶

8836.00

TOTAL This Period (last page this line number only).....▶

110047301-1-1100

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
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Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. BORGER MANAGEMENT INC

Mailing Address 110 D STREET SE

City WASHINGTON State DC Zip Code 20003

Purpose of Disbursement
RENT

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

06 / 02 / 2014

Transaction ID : 2014M07 L2100004

Amount of Each Disbursement this Period

2050.00

Full Name (Last, First, Middle Initial)

B. BOREL ESTATE COMPANY

Mailing Address 1700 S. EL CAMINO REAL

City SAN MATEO State CA Zip Code 94402

Purpose of Disbursement
RENT

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

08 / 02 / 2014

Transaction ID : 2014M07 L2100006

Amount of Each Disbursement this Period

6286.00

Full Name (Last, First, Middle Initial)

C. BOZZUTO MANAGEMENT

Mailing Address 701 STREET SE

City WASHINGTON State DC Zip Code 20003

Purpose of Disbursement
RENT

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

06 / 02 / 2014

Transaction ID : 2014M07 L2100006

Amount of Each Disbursement this Period

4180.08

SUBTOTAL of Disbursements This Page (optional)..... ▶

12516.08

TOTAL This Period (last page this line number only)..... ▶

11002410001-11001

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (in Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. BORGER MANAGEMENT INC

Date of Disbursement

07	02	2014
----	----	------

Mailing Address 110 D STREET SE

Transaction ID : 2014M08L2100013

City State Zip Code
WASHINGTON DC 20003

Amount of Each Disbursement this Period

2050.00

Purpose of Disbursement
RENT

Category/
Type

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

B. BOREL ESTATE COMPANY

Date of Disbursement

07	02	2014
----	----	------

Mailing Address 1700 S. EL CAMINO REAL

Transaction ID : 2014M08L2100014

City State Zip Code
SAN MATEO CA 94402

Amount of Each Disbursement this Period

6266.00

Purpose of Disbursement
RENT

Category/
Type

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

C. BOZZUTO MANAGEMENT

Date of Disbursement

07	02	2014
----	----	------

Mailing Address 701 STREET SE

Transaction ID : 2014M08L2100015

City State Zip Code
WASHINGTON DC 20003

Amount of Each Disbursement this Period

4193.29

Purpose of Disbursement
RENT

Category/
Type

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

SUBTOTAL of Disbursements This Page (optional)..... ▶

12529.29

TOTAL This Period (last page this line number only)..... ▶

1100471001-11001

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
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Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 28	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. BOREL ESTATE COMPANY

Mailing Address 1700 S. EL CAMINO REAL

City SAN MATEO State CA Zip Code 94402

Purpose of Disbursement
RENT

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

08 / 06 / 2014

Transaction ID : 2014M09L2100086

Amount of Each Disbursement this Period

188.58

B. TIM BUTLER

Mailing Address 1676 SHADY CREEK ROAD

City AYDEN State NC Zip Code 28513

Purpose of Disbursement
MANAGEMENT CONSULTING SERVICES

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

08 / 06 / 2014

Transaction ID : 2014M09L2100087

Amount of Each Disbursement this Period

2500.00

C. TIM BUTLER

Mailing Address 1676 SHADY CREEK ROAD

City AYDEN State NC Zip Code 28513

Purpose of Disbursement
TRAVEL EXPENSES

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement

08 / 06 / 2014

Transaction ID : 2014M09L2100088

Amount of Each Disbursement this Period

773.28

SUBTOTAL of Disbursements This Page (optional).....▶

3461.86

TOTAL This Period (last page this line number only).....▶

14004740001

		09/10/2014
WILEY REIN LLP 1776 K. STREET N.W. WASHINGTON, DC 20006	LEGAL AND COMPLIANCE SERVICES	6007.80
WSSC 14501 SWEITZER LANE LAUREL, Maryland 207075902	UTILITIES	9.67
XEROX CORPORATION P O BOX 827598 PHILADELPHIA, Pennsylvania 19182	EQUIPMENT RENTAL	10779.66
BRANCH BANKING & TRUST 1909 K STREET NW 2ND FLOOR WASHINGTON, DC 20006	MAIL PRODUCTION SERVICES	469500.00
BOREL ESTATE COMPANY 1700 S. EL CAMINO REAL SAN MATEO, California 94402	RENT	6474.58
COMMUNICATIONS CORPORATION OF AMERICA 13195 FREEDOM WAY BOSTON, Virginia 22713	POSTAGE	76231.68
EXCLUSIVE CHARTER SERVICES INC 2221 SMITHTOWN AVE RONKONKOMA, New York 11779	TRANSPORTATION SERVICES	5490.00
NGUYEN PROPERTIES LLC 3821 HIGH POINT RD GREENSBORO, North Carolina 27407	VENUE RENTAL	700.00
RHA MARKETING LLC 6910 CRESTWOOD BLVD FREDERICK, Maryland 21703	POSTAGE	18432.64
ROYAL BANQUET HALL 3821-2B HIGH POINT RD GREENSBORO, North Carolina 27407	CATERING/FOOD AND BEVERAGE	1817.00
VIETNAM ENTERTAINMENT GROUP		09/11/2014

16044391741

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

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FOR LINE NUMBER:
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<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. BORGER MANAGEMENT INC

Mailing Address 110 D STREET SE

City WASHINGTON State DC Zip Code 20003

Purpose of Disbursement
RENT

Candidate Name

Office Sought: House Senate President
State: District:

Disbursement For: Primary General Other (specify) ▼

Date of Disbursement

10 / 01 / 2014

Transaction ID : 2014G12L2100010

Amount of Each Disbursement this Period

2050.00

Full Name (Last, First, Middle Initial)

B. BOREL ESTATE COMPANY

Mailing Address 1700 S. EL CAMINO REAL

City SAN MATEO State CA Zip Code 94402

Purpose of Disbursement
RENT

Candidate Name

Office Sought: House Senate President
State: District:

Disbursement For: Primary General Other (specify) ▼

Date of Disbursement

10 / 01 / 2014

Transaction ID : 2014G12L2100011

Amount of Each Disbursement this Period

6474.58

Full Name (Last, First, Middle Initial)

C. BOZZUTO MANAGEMENT

Mailing Address 701 STREET SE

City WASHINGTON State DC Zip Code 20003

Purpose of Disbursement
RENT

Candidate Name

Office Sought: House Senate President
State: District:

Disbursement For: Primary General Other (specify) ▼

Date of Disbursement

10 / 01 / 2014

Transaction ID : 2014G12L2100012

Amount of Each Disbursement this Period

4182.88

SUBTOTAL of Disbursements This Page (optional).....▶

12887.46

TOTAL This Period (last page this line number only).....▶

10044001-42

